

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTELLECTUAL VENTURES I LLC,

Plaintiff,

v.

AT&T MOBILITY LLC; AT&T
MOBILITY II LLC; NEW CINGULAR
WIRELESS SERVICES, INC.; SBC
INTERNET SERVICES, INC.; AND
WAYPORT, INC.,

Defendants

and

SIERRA WIRELESS AMERICA, INC.,

Intervenor.

Civil Action No. 12-cv-193-LPS

JURY TRIAL DEMANDED

INTELLECTUAL VENTURES II LLC,

Plaintiff,

v.

AT&T MOBILITY LLC; AT&T
MOBILITY II LLC; NEW CINGULAR
WIRELESS SERVICES, INC.; SBC
INTERNET SERVICES, INC.; AND
WAYPORT, INC.,

Defendants.

Civil Action No. 13-cv-1631-LPS

JURY TRIAL DEMANDED

INTELLECTUAL VENTURES I LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND T-MOBILE
US, INC.,

Defendants.

Civil Action No. 13-cv-1632-LPS

JURY TRIAL DEMANDED

INTELLECTUAL VENTURES II LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND T-MOBILE
US, INC.,

Defendants.

Civil Action No. 13-cv-1633-LPS

JURY TRIAL DEMANDED

INTELLECTUAL VENTURES I LLC,

Plaintiff,

v.

NEXTEL OPERATIONS, INC. AND
SPRINT SPECTRUM L.P.,

Defendants.

Civil Action No. 13-cv-1634-LPS

JURY TRIAL DEMANDED

INTELLECTUAL VENTURES II LLC,

Plaintiff,

v.

NEXTEL OPERATIONS, INC. AND
SPRINT SPECTRUM L.P.,

Defendants.

Civil Action No. 13-cv-1635-LPS

JURY TRIAL DEMANDED

INTELLECTUAL VENTURES I LLC,

Plaintiff,

v.

UNITED STATES CELLULAR
CORPORATION,

Defendant.

Civil Action No. 13-cv-1636-LPS

JURY TRIAL DEMANDED

INTELLECTUAL VENTURES II LLC,

Plaintiff,

v.

UNITED STATES CELLULAR
CORPORATION,

Defendant.

Civil Action No. 13-cv-1637-LPS

JURY TRIAL DEMANDED

STIPULATION AND [PROPOSED] ORDER TO EXTEND FACT DISCOVERY

The parties are currently engaged in a substantial amount of discovery, with several dozen depositions scheduled between now and the August 31, 2015, discovery cutoff. The parties have met and conferred regarding a large number of outstanding issues and believe that a short extension of the discovery deadline will facilitate resolving many of those issues.

Accordingly, the parties hereby agree, subject to the approval of the Court, that the Second Scheduling Order entered on June 8, 2015 (D.I. 537) is further amended as follows:

1. The deadline for completion of fact discovery (see, D.I. 537 at para. 3) is extended from August 31, 2015, to September 30, 2015.
2. Other than for good cause shown, the deadline for initiating discovery against a party shall be extended to August 3, 2015, but shall otherwise remain governed by the Second

Scheduling Order entered on June 8, 2015 (D.I. 537). For clarity, the last date to serve written discovery requests on a party by hand is August 3, 2015. The last date for noticing depositions shall remain governed by Local Rule 30.1 of Civil Practice and Procedure of the United States District Court for the District of Delaware as if the discovery deadline were August 31, 2015. The foregoing limits on the timing of party discovery do not apply to non-party discovery or with respect to discovery concerning the authenticity of evidence or whether evidence qualifies as prior art, and the parties anticipate working with one another to identify evidence for which there is a factual dispute concerning authenticity or qualification as prior art so that discovery on such items can be completed in an orderly and timely manner.

3. The deadlines for final infringement and invalidity contentions, and expert discovery (see, D.I. 537 at paras. 3.b.i, 3.b.ii, 4.a, and 4.b.i) are extended for 30 days as follows:

Final infringement contentions: October 14, 2015;

Final invalidity contentions: November 6, 2015;

Federal Rule of Civil Procedure 26(a)(2) disclosure of expert testimony: December 18, 2015;

Supplemental disclosure to contradict or rebut evidence on the same matter: May 2, 2016;

Reply expert reports: July 1, 2016;

Expert discovery will close on September 30, 2016.

Dated: July 31, 2015

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Respectfully submitted,

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IT IS SO ORDERED this ____ day of _____, 2015.

The Honorable Leonard P. Stark